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Attorneys for Plaintiff
OWEN DIAZ

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

DEMETRIC DI-AZ, OWEN DIAZ, and
LAMAR PATTERSON.

Plaintiffs,

V.

TESLA, INC. dba TESLA MOTORS, INC.;
CITISTAFF SOLUTIONS, INC.; WEST
VALLEY STAFFING GROUP;
CHARTWELL STAFFING SERVICES, INC.;
and DOES 1-50, inclusive.

Defendants.

Case No. 3:17-cv-06748-WHO

**SUPPLEMENTAL DECLARATION OF
CIMONE NUNLEY IN SUPPORT OF
PLAINTIFF'S ADMINISTRATIVE
MOTION TO FILE UNDER SEAL**

Date: May 11, 2020

Time: 10:00 a.m.

Courtroom: 2, 17th Floor

Judge: Hon. William H. Orrick

Trial Date: June 8, 2020

Complaint filed: October 16, 2017

1 I, CIMONE A. NUNLEY, hereby declare:

2 1. I am an attorney licensed to practice law in the State of California. I am an
3 attorney with the law firm of California Civil Rights Law Group, attorneys of record for Plaintiff
4 Owen Diaz in this action. I submit this Supplemental Declaration in support of Plaintiff's
5 Motions *in Limine* nos. 1 through 6. I have personal knowledge of the facts stated herein and if
6 called upon to testify, I could and would competently testify thereto, except as to those matters
7 that are stated upon information and belief.

8 2. Attached hereto and marked as Supplemental Exhibit 1 are true and correct copies
9 of various excerpts from Volume I of the deposition of Plaintiff Owen Diaz. Defendant Tesla,
10 Inc. (hereinafter "Defendant") marked this document as "confidential" pursuant to the Protective
11 Order and the document should therefore be sealed pursuant to this Order.

12 3. Attached hereto and marked as Supplemental Exhibit 2 is a true and correct copy
13 of a document produced by Defendant in discovery and Bates stamped TESLA-0000004 to
14 TESLA-0000008. Defendant marked this document as "confidential" pursuant to the Protective
15 Order and the document should therefore be sealed pursuant to this Order.

16 4. Attached hereto and marked as Supplemental Exhibit 3 is a true and correct copy
17 of a document produced by Defendant in discovery and Bates stamped TESLA-0000732 to
18 TESLA-0000734. Defendant marked this document as "confidential" pursuant to the Protective
19 Order and the document should therefore be sealed pursuant to this Order.

20 5. Attached hereto and marked as Supplemental Exhibit 4 are true and correct copies
21 of documents produced by former Defendant nextSource, Inc. (hereinafter "nextSource") in
22 discovery and Bates stamped NS000012 to NS000013. nextSource marked this document as
23 "confidential" pursuant to the Protective Order and the document should therefore be sealed
24 pursuant to this Order.

1 6. Attached hereto and marked as Supplemental Exhibit 5 is a true and correct copy
2 of a document produced by nextSource in discovery and Bates stamped NS000136 to NS000137.
3 nextSource marked this document as “confidential” pursuant to the Protective Order and the
4 document should therefore be sealed pursuant to this Order.

5 7. Attached hereto and marked as Supplemental Exhibit 6 is a true and correct copy
6 of a document produced by Defendant in discovery and Bates-stamped TESLA-0000125 to
7 TESLA-0000130. Defendant marked this document as “confidential” pursuant to the Protective
8 Order and the document should therefore be sealed pursuant to this Order.

9 8. Attached hereto and marked as Supplemental Exhibit 7 are true and correct copies
10 of documents produced by Defendant in discovery and Bates-stamped TESLA-0000702 to
11 TESLA-0000703. Defendant marked this document as “confidential” pursuant to the Protective
12 Order and the document should therefore be sealed pursuant to this Order.

13 9. Attached hereto and marked as Supplemental Exhibit 8 are true and correct copies
14 of documents produced by Defendant in discovery and Bates-stamped TESLA-0000127 to
15 TESLA-0000128. Defendant marked this document as “confidential” pursuant to the Protective
16 Order and the document should therefore be sealed pursuant to this Order.

17 10. Attached hereto and marked as Supplemental Exhibit 9 is a true and correct copy
18 of a document produced by Defendant in discovery and Bates-stamped TESLA-0000664.
19 Defendant marked this document as “confidential” pursuant to the Protective Order and the
20 document should therefore be sealed pursuant to this Order.

21 11. Attached hereto and marked as Supplemental Exhibit 10 is a true and correct copy
22 of a document produced by Defendant in discovery and Bates stamped TESLA-0000319.
23 Defendant marked this document as “confidential” pursuant to the Protective Order and the
24 document should therefore be sealed pursuant to this Order.

1 12. Attached hereto and marked as Supplemental Exhibit 11 is a true and correct copy
2 of a document produced by Defendant in discovery and Bates-stamped TESLA-0000320.
3 Defendant marked this document as “confidential” pursuant to the Protective Order and the
4 document should therefore be sealed pursuant to this Order.

5 13. Attached hereto and marked as Supplemental Exhibit 12 is a true and correct copy
6 of a document produced by Defendant in discovery and Bates-stamped TESLA-0000612.
7 Defendant marked this document as “confidential” pursuant to the Protective Order and the
8 document should therefore be sealed pursuant to this Order.

9 14. Attached hereto and marked as Supplemental Exhibit 13 are true and correct
10 copies of documents produced by Defendant in discovery and Bates-stamped TESLA-0000336
11 to TESLA0000338. Defendant marked this document as “confidential” pursuant to the Protective
12 Order and the document should therefore be sealed pursuant to this Order.

13 15. Attached hereto and marked as Supplemental Exhibit 14 are true and correct
14 copies of documents produced by Defendant in discovery and Bates stamped TESLA-0000505 to
15 TESLA0000506. Defendant marked this document as “confidential” pursuant to the Protective
16 Order and the document should therefore be sealed pursuant to this Order.

17 16. Attached hereto and marked as Supplemental Exhibit 15 is a true and correct copy
18 of a document produced by Defendant in discovery and Bates stamped TESLA-0000557.
19 Defendant marked this document as “confidential” pursuant to the Protective Order and the
20 document should therefore be sealed pursuant to this Order.

21 17. Attached hereto and marked as Supplemental Exhibit 16 is a true and correct copy
22 of a document produced by Defendant in discovery and Bates stamped TESLA-0000704 to
23 TESLA-0000705. Defendant marked this document as “confidential” pursuant to the Protective
24 Order and the document should therefore be sealed pursuant to this Order.

18. Attached hereto and marked as Supplemental Exhibit 17 are true and correct copies of documents produced by Defendant in discovery and Bates stamped TESLA-0000708 to TESLA0000709. Defendant marked this document as “confidential” pursuant to the Protective Order and the document should therefore be sealed pursuant to this Order.

19. Attached hereto and marked as Supplemental Exhibit 18 are true and correct copies of documents produced by Defendant in discovery and Bates stamped TESLA0000741 to TESLA-0000743. Defendant marked this document as “confidential” pursuant to the Protective Order and the document should therefore be sealed pursuant to this Order.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on April 20, 2020 in Sacramento, California.

DATED: April 20, 2020

By:

Lawrence A. Organ, Esq.
Navruz Avloni, Esq.
J. Bernard Alexander, Esq.
Cimone A. Nunley, Esq.
Attorneys for Plaintiff
OWEN DIAZ